

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

JOEL ROSS

Plaintiff,

V.

**SEAWORLD PARKS & ENTERTAINMENT
LLC, d/b/a BUSCH GARDENS
WILLIAMSBURG**

Case No. 4:23-cv-109

And

JOHN DOE

Defendants.

MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The Parties, Plaintiff Joel Ross and Defendant SeaWorld Parks & Entertainment LLC, d/b/a Busch Gardens Williamsburg (“Busch Gardens”), each by their respective counsel, pursuant to Fed. R. Civ. P. 26(c), jointly request that the Court enter the attached “Stipulated Protective Order” (Ex. A) as documents relevant to this litigation involve confidential personal information.

WHEREFORE, movants respectfully request this Court enter the proposed Stipulated Protective Order.

WE ASK FOR THIS:

/s/ Jeffrey P. Miller

Ashley W. Winsky (VSB No. 79224)

Jeffrey P. Miller (VSB No. 89410)

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/s/ Jared C. Birckholtz (w/ permission)

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